

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO,
ET AL.,

Defendants.

No. 12-cv-2039 (GAG)

**MOTION FOR EXTENSION OF TIME
TO FILE MOTION ON LAW 144-2020**

COMES NOW, Plaintiff, the United States of America, and respectfully moves for a brief extension of time to file its motion on Law 144-2020, concerning the unification of local law enforcement officers following emergency declarations, as directed by the Court in its Order of November 4, 2020. Dkt. 1607. For cause, the United States alleges, states, and prays as follows:

1. On November 4, 2020, the Court set a briefing schedule to address actual or potential conflicts between Puerto Rico Law 144-2020, a newly-enacted law authorizing the unification of local law enforcement officers following emergency declarations, and the Agreement for the Sustainable Reform of the Puerto Rico Police Bureau (Agreement), Dkt. 60. Order, Dkt. 1607 (Nov. 4, 2020). As part of its Order, the Court directed the Monitor to “provide to the parties and Special Master a rundown of areas in the legislation which actually or potentially conflict with the Agreement, as well as a brief explanation as to why.” *Id.* The Court ordered further, “Once USDOJ has both the Monitor's input, as well as the benefit of the translation it shall file with the Court on or before November 18, 2020, a motion addressing all areas of concern, as well as any possible remedies where a conflict with the Agreement arises.” *Id.*

2. To date, the United States has not received the Monitor's input on Law 144-2020. Thus, the United States is unable to address the Monitor's concerns regarding potential or actual conflicts with the legislation by the Court's deadline of November 18, 2020. The Monitor informed the United States on November 17, 2020, that the Monitor's Office is working diligently to complete its review of Law 144-2020, and provide the required information to the parties and the Special Master. The United States understands that the Governor's recent deployment of the Puerto Rico National Guard to support the implementation of new public health measures to curb the spread of COVID-19 has placed exigent demands on the Monitor's Office.
3. Once the United States receives and evaluates the Monitor's input on Law 144-2020, it will be in a position to submit a motion addressing all of the Monitor's concerns in compliance with the Court's November 4, 2020, Order. Accordingly, the United States respectfully requests twelve (12) business days from the date the United States receives the Monitor's input to file its motion on potential or actual conflicts between Law 144-2020, and the Agreement.

WHEREFORE, the United States requests respectfully that the Court grant the United States twelve (12) business days from the date the United States receives the Monitor's input on Law 144-2020, to file a motion in compliance with the Court's November 4, 2020, Order, Dkt. 1607.

I HEREBY CERTIFY that on this date I filed the foregoing pleading electronically through the CM/ECF system, which caused the parties, counsel of record and the Monitor on the service list to be served by electronic means.

Respectfully submitted, this 18th day of November, 2020,

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s/ Luis E. Saucedo

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